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July 23, 1999

BY HAND DELIVERY

EX PARTE


Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Portals II
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Application of SBC Communications, Inc. and
Ameritech Corporation for Authority To Transfer
Control of Certain Licenses and Authorizations, CC
Docket No. 98-141 – Ex Parte Presentation

Dear Ms. Salas:

Attached for filing pursuant to the Commission's ex parte rules are
copies of a letter sent today by Lynn S. Starr of Ameritech Corporation to Sarah
Whitesell of Commissioner Tristani's office.

Respectfully submitted,


Mark C. Del Bianco

No. of Copies rec'd 012
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Lynn Shapiro Starr
Vice President
Regulatory Affairs

July 23, 1999

JUL 28 1999

Ms. Sarah Whitesell
Office of Commissioner Gloria Tristani
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Application of SBC Communications, Inc. and
Ameritech Corporation for Authority To Transfer
Control of Certain Licenses and Authorizations, CC
Docket No. 98-141 – Written Ex Parte Presentation

Dear Ms. Whitesell:

Thank you again for taking the time to meet with Toni Cook Bush and me. I am writing to provide the additional information you requested.

Your first request was for additional information about Ameritech's Ohio Lifeline plan, which provides discount voice telephone service to Ohio residential customers who meet the income eligibility requirements. The program was originally approved as part of the Advantage Ohio alternative regulation plan. Currently, although customers may subscribe to either flat rate or usage sensitive type local calling, optional features are not permitted. Ameritech Ohio has another Lifeline Program that allows optional features with a lower discount of \$5.25, but this program is not part of the Advantage Ohio program relating to the merger commitment.

The enhanced Advantage Ohio Lifeline plan has been a success. For example, year to date customer gain through June in the Advantage Ohio Lifeline program has been over 18%. Ameritech has recently undertaken additional activities

Ms. Sarah Whitesell
July 23, 1999
Page 2

to publicize the availability of the program in Ohio and has installed telephone lines at the Ohio Department of Human Services for potential participants to call Ameritech and enroll in the program. Ameritech has now committed to the Public Utilities Commission of Ohio that it will maintain the Lifeline plan as presently in effect through at least January 2002. Additional material about the Lifeline program is attached as Exhibit A.

You also asked for information about the actions that SBC and Ameritech would be required to take prior to closing the merger, under the Merger Conditions tentatively agreed to between the applicants and the Commission staff. Six sections in the Merger Conditions impose pre-closing requirements. Under Section I, SBC and Ameritech are obligated to begin collecting data on various performance measures in the SBC/Ameritech states; these obligations have begun in some SBC states and will continue to go into effect in the remaining SBC and Ameritech states on a rolling basis. The first report to the Commission is due August 1 for certain SBC states. Section II requires SBC/Ameritech, prior to the merger closing date, to: (1) file a collocation tariff and/or offer amendments (for inclusion in interconnection agreements) containing standard terms and conditions ("T&C") for collocation; (2) retain independent auditors to confirm that the T&C comply with the Commission's collocation rules; and (3) propose an independent auditor to verify SBC/Ameritech's compliance with the Commission's collocation requirements for the first 8 months after the merger closing date. Under Section III, SBC/Ameritech must provide by the merger closing date an OSS Process Improvement Plan identifying and assessing their existing operations support systems ("OSS") and generally identifying the OSS changes that are needed to implement the OSS commitments in the Conditions.

Under Section VI, SBC/Ameritech must, by the merger closing date, provide CLECs (in all states except Connecticut and Nevada) access to the same loop pre-qualification information that the SBC/Ameritech retail operations have. Section VII requires that, prior to the merger closing date, (1) Ameritech provide Advanced Services¹ through one or more separate Advanced Services affiliates ("SASAs") in

¹ The Conditions define the term "Advanced Services" as wireline telecommunications services that rely on packetized technology and have the capability of supporting transmissions speeds of a least 56 kilobits per second in at least
(continued...)

each Ameritech state, and (2) SBC incorporate one or more SASA(s) to provide Advanced Services in the SBC states, negotiate ILEC interconnection agreements and file for any necessary state certifications for such SASAs. Finally, Section VIII requires Ameritech to file tariffs and/or offer amendments in each of its states to provide shared transport. Exhibit B to this letter contains a more detailed summary of the requirements in those sections, while Exhibit C contains a copy of the detailed timeline for all the Merger Conditions that was attached to the ex parte filing made by SBC and Ameritech on July 8, 1999.

Finally, you sought clarification regarding Section XXI of the Merger Conditions (the National-Local Strategy), which provides that SBC will have met its initial commitment in each new market once it is providing facilities-based service to at least one customer. There are five milestones for determining when SBC is "providing services" in each of the 30 out-of-region markets. In each market, there is an initial deadline by which SBC/Ameritech must (1) install or obtain local switching capacity and (2) provide facilities-based service to at least one customer in that market. The switching facilities must be other than those of an ILEC or a cellular affiliate of SBC/Ameritech. For Boston, Miami and Seattle, this initial deadline is 12 months after the merger closing date; for the next 12 markets, the date is 18 months after the merger closing date; and for the final 15 markets, 30 months after the closing date.

In addition, for each market there is a second deadline, the "Full Service Deadline," by which time three other milestones must be met. Specifically, SBC/Ameritech (1) must have collocated switching equipment in at least ten of the incumbent LEC's wire centers, (2) begun offering facilities-based local exchange service to all business and residential customers served by those wire centers, and (3) begun offering service – on a facilities, resale or other basis – to all residential and business customers in that city or metropolitan area. The Full Service Deadline for each of the 30 markets is one year after the initial deadline. Thus, for example, the Full Service Deadline for Boston, Miami and Seattle is 24 months after the merger closing date. By that time, SBC must be offering service to (i.e., making service available when requested by) potential customers throughout the Boston, Miami and

¹ (...continued)
one direction. This definition of Advanced Services does not include data services that are not based on packetized technology, such as ISDN.

Ms. Sarah Whitesell

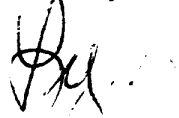
July 23, 1999

Page 4

Seattle metropolitan areas. Thus, the requirement to serve at least one customer on a facilities basis is merely an interim benchmark on the path to robust, facilities-based competition by SBC/Ameritech in each of the 30 markets. Section XXI as a whole will ensure that this competition develops on a clear and rapid schedule.

I hope that this letter provides sufficient information about each of the three issues we discussed last week. If you have additional questions or if you feel more information would be useful, please do not hesitate to contact me or Toni Cook Bush at 371-7230.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Shapiro Starr", written over a horizontal line.

Lynn Shapiro Starr

EXHIBIT A

EXPLANATION OF ADVANTAGE OHIO LIFELINE PLAN

The Universal Service Assistance Plan (USA) was one of the Ameritech Ohio commitments approved by the Ohio Commission as part of the Advantage Ohio alternative regulation plan. The USA plan originally provided a monthly discount of \$8.00 toward the basic residential access line for qualifying customers. Federal funding contributed \$3.50 of the \$8.00, while Ameritech Ohio contributed \$4.50. Of the Ameritech Ohio contribution, \$3.50 was reimbursed by the State of Ohio in the form of gross receipts tax credits for those customers who qualified for the State of Ohio Telephone Service Assistance Plan (TSA) explained below. Therefore, the net Ameritech Ohio contribution was \$1.00 for TSA customers and \$4.50 for non-TSA customers.

The TSA provides a monthly discount equal to the Federal Subscriber Line Charge for eligible customers. This discount is reimbursable through gross receipts tax credits. TSA eligibility is limited to recipients of energy assistance, supplemental security income on the basis of blindness or disability, or both state medical assistance and medicare. TSA customers are required to take usage sensitive forms of basic local service and are prohibited from subscribing to optional features. Because of the restrictive nature of program criteria, TSA-eligible customers represent only about 14% of Ameritech Ohio customers participating in the Advantage Ohio USA plan.

With the increase in Federal support provided pursuant to FCC 97-157, Ameritech Ohio voluntarily agreed to increase the \$8.00 USA monthly discount to \$10.20. The \$10.20 discount covers the full monthly rate of the basic network access line including the Federal Subscriber Line Charge, but excluding local usage. Of the \$10.20, basic Federal Lifeline support contributes \$5.25 and the remaining \$4.95 comes from a combination of state and supplementary Federal Lifeline support. For TSA-eligible customers, Ameritech Ohio contributes \$3.50 (which is reimbursed by the State of Ohio through gross receipts tax credits) and supplementary Federal support amounts to \$1.45. For non-TSA eligible customers, basic Federal Lifeline support contributes \$5.25, Ameritech Ohio contributes \$3.30 and supplementary Federal Lifeline support contributes \$1.65. There is no reimbursement from the State of Ohio for non-TSA customers.

It should be noted that the USA Advantage Ohio commitment of an \$8.00 monthly discount includes a maximum Ameritech component of \$4.50. Thus, for example, if total Federal support amounted to \$5.25, USA customers would receive a \$9.75 monthly discount (\$4.50 plus \$5.25) rather than \$10.20. In theory, given Federal support up to \$7.00, the USA discount could be as much as \$11.50, but the discount was limited to \$10.20 because that amount covers the total access line rate. Unless certain medical exceptions apply, USA customers are prohibited from subscribing to optional services.

USA program eligibility is based on receiving aid from at least one of the following programs:

- Home Energy Assistance Program (HEAP)
- Emergency HEAP (E-HEAP)
- Ohio Energy Credit Program (OECF)
- Medicaid
- Supplemental Security Income (SSI)
- Federal Public Housing/Section 8
- Food Stamps
- Ohio Works First (Formerly AFDC)
- Disability Assistance

Currently, the USA program provides the following benefits:

- A monthly \$10.20 discount
- No security deposit
- Free installation
- Free Touch-Tone
- Free call blocking for 900 and 976 numbers
- Free blocking of long distance services
- Payment arrangements on outstanding bills

The USA program described above is marketed as USA Plan 1. Ameritech Ohio also offers a Lifeline Assistance program known as USA Plan 2 which provides a \$5.25 monthly discount (reimbursed through Federal Lifeline assistance) to eligible customers. In this program, customers may subscribe to optional features. While this plan carries a USA designation for marketing purposes, it should not be confused with the Advantage Ohio USA program. USA Plan 2 is not part of the Advantage

Ohio USA commitment and would therefore not be part of the FCC merger commitment.

EXHIBIT B

SUMMARY OF PROPOSED CONDITIONS TO BE SATISFIED PRIOR TO SBC/AMERITECH MERGER CLOSING

Section I: Federal Performance Parity Plan

1. SBC/Ameritech will implement in all 13 in-region states a set of 20 performance measures designated as the Federal Performance Parity Plan ("the Plan"). The 20 performance measures, which are identified in Exhibit B-1 to this letter, are a subset of those implemented pursuant to the Texas PUC collaborative process. They cover, among other things, OSS FOCs, provisioning intervals, maintenance times, interconnection trunk restoration, LNP, OSS interfaces, collocation due dates and billing.
2. The performance measures are to be implemented on a rolling schedule, with some to begin immediately in certain states and the remainder phased in by three months after the merger closing date. Specifically:
 - a. In Arkansas, California, Kansas, Missouri, Nevada, Oklahoma, and Texas (together with Connecticut, the "SBC States"), SBC/Ameritech shall implement performance measurements 1-2c, 3-5, 8-11, and 13-20, and provide 2 months of performance data on these measures by August 1, 1999.
 - b. In these states, SBC/Ameritech shall implement performance measurements 2d, 6, 7, and 12, and provide 2 months of performance data on these measures, by November 1, 1999. In California, SBC/Ameritech shall implement performance measurements 2, 13, and 17, and provide 2 months of performance data on these measures by November 1, 1999; and shall resolve minor differences in the business rules for performance measurements 1, 3a, 4c, 8, 9a, 16, and 20 by November 1, 1999, either by (i) changing the California business rules to be compliant with the Plan, or (ii) obtaining a waiver from the Chief of the Common Carrier Bureau permitting SBC/Ameritech to utilize the California business rules for these performance measurements in California.

Section II: Collocation Compliance Plan

1. In the SBC/Ameritech States, SBC/Ameritech will provide collocation consistent with governing Commission rules, including the March 31, 1999, Collocation and Advanced Services Order.
2. Prior to the Merger Closing Date, SBC and Ameritech shall:
 - a. in each of the SBC/Ameritech States, file a collocation tariff and/or offer amendments (for inclusion in interconnection agreements) containing standard terms and conditions for collocation;

b. retain one or more independent auditors to perform an examination engagement and issue an attestation report that the terms and conditions offered in the tariffs and amendments comply with the Commission's collocation rules; and

c. propose an independent auditor to verify SBC/Ameritech's compliance with the Commission's collocation requirements for the first 8 months after the Merger Closing Date.

Section III: OSS: Enhancements and Additional Interfaces

1. No later than the Merger Closing Date, SBC/Ameritech shall provide the Commission an OSS Process Improvement Plan identifying and assessing SBC's and Ameritech's existing OSS and generally identifying the OSS changes that are needed to implement SBC/Ameritech's OSS commitments.

Section VI: xDSL and Advanced Services Deployment

1. SBC/Ameritech shall provide unaffiliated CLECs with nondiscriminatory, electronic pre-order OSS access to the same loop pre-qualification information that is available to SBC/Ameritech's retail operations, including the retail operations that will be part of the separate Advanced Services affiliates described in Section VII.

a. This information shall be provided on an individual address basis (e.g., whether the theoretical loop length is less than 12,000 feet from the customer premise to the central office; between 12,000 and 17,500 feet from the customer premise to the central office; or greater than 17,500 feet from the customer premise to the central office).

b. This information shall be available not later than the Merger Closing Date in all SBC States except Connecticut and Nevada. This information shall be made available in Connecticut, Nevada, and the Ameritech States, on a phased-in basis, by no later than 22 months after the Merger Closing Date.

c. SBC/Ameritech shall provide CLECs in the SBC/Ameritech States nondiscriminatory access to loop pre-qualification information (i.e., whether the theoretical loop length is less than 12,000 feet from the customer premise to the central office; between 12,000 and 17,500 feet from the customer premise to the central office; or greater than 17,500 feet from the customer premise to the central office), and loop qualification information (i.e., whether the loop contains bridged taps, load coils, or repeaters) whether such access is by electronic or non-electronic means.

Section VII: Structural Separation for Advanced Services

1. SBC/Ameritech must begin to provide Advanced Services¹ through one or more separate Advanced Services affiliates ("SASAs"). In any state where SBC/Ameritech is providing Advanced Services on the Merger Closing Date, it shall establish a SASA prior to that date. In the Ameritech states, where a SASA is already established, SBC/Ameritech shall provide Advanced Services through the SASA no later than the Merger Closing Date. In the SBC states, SBC/Ameritech must incorporate one or more SASAs (if necessary), begin to negotiate ILEC interconnection agreements and file for any necessary state certifications for the SASAs, so that it can begin providing Advanced Services through the SASAs under the phased-in timetable of Paragraph 31.
2. SBC/Ameritech ILECs may (but shall not be required to) transfer to the SASA, on an exclusive basis, any Advanced Services Equipment during a "Grace Period." The "Grace Period" shall be from July 1, 1999 until the date that is six months after the date that the Commission issues a final order, not including any appeals, in the UNE remand proceeding (CC Docket 96-98). Such transferable Advanced Services Equipment does not include any facilities or equipment deemed to be a UNE under the FCC's original UNE rule, 47 C.F.R. § 51.319 (as in effect on January 24, 1999). The SASA shall not be deemed a successor or assign of a BOC for purposes of applying 47 U.S.C. § 153(4)(A) as a result of such transfer. There is an escape clause providing that if any portion of this paragraph is found invalid or is otherwise overridden by a judicial or administrative order, SBC/Ameritech shall not have any separate affiliate obligations with respect to Advanced Services. The section contains detailed provisions setting forth the steps SBC/Ameritech will take to establish SASA(s) and seek any necessary state certifications.

Section VIII: Shared Transport

1. No later than the Merger Closing Date, and until such time, if any, that the Commission enters a final and non-appealable order finding that either local switching or transport is not a UNE nationally or in specific geographic areas, SBC/Ameritech shall, in the Ameritech States, file tariffs, and/or offered amendments containing standard terms and conditions for inclusion in interconnection agreements under 47 U.S.C. § 252, to make available, subject to State Commission Approval, the function of shared transport (as

¹ For purposes of these Conditions, the term "Advanced Services" means wireline, telecommunications services, such as ADSL, IDSL, xDSL, Frame Relay, Cell Relay and Dial Access Service that rely on packetized technology and have the capability of supporting transmissions speeds of a least 56 kilobits per second in at least one direction. This definition of Advanced Services does not include data services that are not based on packetized technology, such as ISDN.

defined in the Third Order on Reconsideration and Further Notice of Proposed Rulemaking, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, 12 FCC Rcd 12460 (1997)), in conjunction with local switching, on an interim basis as follows:

a. SBC/Ameritech shall not require use of dedicated transport or customized routing to complete all calls using local switching and shared transport. SBC/Ameritech shall make available a modified version of transiting that does not require a dedicated end office integration ("EOI") transit trunk. SBC/Ameritech shall withdraw Ameritech's proposal for the Commission to establish a separate transit service rate to be charged in conjunction with shared transport (as described in Ameritech's March 25, 1999, ex parte filing in CC Docket No. 96-98).

b. Where an end user customer served by a CLEC using SBC/Ameritech's shared transport facilities makes or receives an intraLATA or interLATA call carried by an interexchange carrier, SBC/Ameritech shall collect its relevant access charges from the interexchange carrier. Based upon originating and terminating usage factors, SBC/Ameritech shall then make payment to (or receive payment from) the CLEC based on the difference between the access charges and the applicable charges for the UNEs used by the CLEC to provide the access service.

c. SBC/Ameritech may charge a CLEC using SBC/Ameritech's local switching and shared transport facilities to originate traffic for the CLEC's usage of local switching and a usage-sensitive shared transport rate. The shared transport rate shall be based upon a blend of direct and tandem-routed traffic and either local switch usage at the terminating SBC/Ameritech end office or transiting and applicable termination charges for traffic to a non-SBC/Ameritech end office. SBC/Ameritech shall not charge a CLEC using SBC/Ameritech's local switching for usage at the terminating switch to which the CLEC's traffic is delivered by shared transport facilities. SBC/Ameritech shall not be required to create message records for terminating usage under these Conditions.

d. SBC/Ameritech shall offer to include in its approved interconnection agreements for the Ameritech States a retroactive true-up provision that would become effective upon a state commission's final and unappealable decision modifying either SBC/Ameritech's proposed access charge settlement methodology or SBC/Ameritech's proposed shared transport rate.

IMPLEMENTATION TIMELINE

Date	Required Action
August 1, 1999	Performance Measurements: Implement and provide 2 months of performance data for Performance Measurements 1-2c, 3-5, 8-11, 13-20 in SBC States except California, Nevada, and Connecticut (§ 2)
November 1, 1999	Performance Measurements: Implement and provide 2 months of performance data for Performance Measurements 2a, 2d, 5a, 8, 9b, 10a, 10b, 11a, 11b, 14-16, 18-20 in California and Nevada (§ 2)
Prior to the Merger Closing Date	Performance Measurements: Implement and provide 2 months of performance data for Performance Measurements 2d, 6, 7, 12 in SBC States except California, Nevada, and Connecticut (§ 2)
	Performance Measurements: Implement and provide 2 months of performance data for Performance Measurements 1, 2c, 3a, 3c, 4a, 4b, 5c, 6-7, 9a, 9c, 10c, 11c, 12, 13, 17, and for Performance Measurements 2b, 3b, 4c, 5b (following California and Nevada business rules) in California and Nevada (§ 2)
	File a collocation tariff and/or offer agreement amendments containing standard terms and conditions for collocation (§ 4)
	Provide an independent auditor's report(s) on collocation terms and conditions and associated methods and procedures (§ 5)
	Select an independent auditor to conduct a full collocation compliance audit (§ 6)
	Negotiate agreements between Advanced Services subsidiar(ies) and ILECs and file them for approval (§ 29)
	File for any state certifications or approvals necessary for the separate affiliate(s) to provide Advanced Services (§ 29)
	Incorporate Advanced Services subsidiar(ies) for SBC states (§ 30)
	Recommend to the Commission an independent auditor to conduct the first annual compliance review (§ 62)
Merger Closing Date	Provide collocation consistent with the Commission's rules (§ 3)
	Provide the FCC with an OSS Process Improvement Plan (§ 8)
	Offer to develop a method of direct access to SBC/Ameritech's service order processing systems for requesting CLECs (§ 12)
	Offer to develop and deploy enhancements to the existing EBI interface for OSS that support maintenance/repair (§ 13)
	Provide access to Ameritech's existing EBI interface in Ameritech States (§ 16)
	Provide direct access to SORD, and Ameritech's and SNET's equivalent service order processing systems for pre-ordering and ordering xDSL and Advanced Services (§ 16)
	Provide CLECs access to the same loop pre-qualification information available to retail operations, in all SBC States except Connecticut and Nevada (§ 21)
	Provide Advanced Services through separate affiliates in Ameritech States (§ 31)

Date	Required Action
Merger Closing Date, continued	File tariffs to implement the interim shared transport solution in the Ameritech States (§ 41) Withdraw Ameritech's proposal for the FCC to establish a separate transit service rate to be charged in conjunction with shared transport (§ 41)
	Continue providing UNEs in accordance with prior commitment letters (§ 43)
	Implement an alternative dispute resolution process to resolve carrier-to-carrier disputes, including disputes related to existing and effective interconnection agreements (§ 50 & Attachment E)
	Offer to implement MFN provision based on out-of-region agreements (§ 51)
	Offer to implement MFN provision based on in-region agreements (§ 52)
	Make available and offer to negotiate an interconnection or resale agreement covering the provision of interconnection arrangements or UNEs in two or more SBC/Ameritech States designated by the requesting telecommunications carrier (§ 53)
	Continue participation in the Network Reliability and Interoperability Council or a successor organization, if any (§ 55)
	Offer to conduct a trial with one or more interested, unaffiliated CLECs in each of five large cities within the SBC/Ameritech States to identify the procedures and associated costs required to provide CLECs with access to cabling within MDUs and multi-tenant premises, where SBC/Ameritech controls the cables (§ 57)
	Subject to owner approval, install and provide the new cables in a manner that will permit CLECs a single point of interface (§ 58)
	Appoint corporate compliance officer to ensure deadlines being met (§ 62)
First billing cycle that begins after the Merger Closing Date	Eliminate all charges for use of standard electronic interfaces for accessing OSS (§ 18)
30 days following the Merger Closing Date	Designate and make available (for a minimum of one year) one or more teams of a sufficient number of OSS experts, provided such small CLECs have contracted for OSS in their interconnection agreements (§ 19)
	Discount 25 percent off the recurring and nonrecurring charges that otherwise would be applicable for unbundled local loops used to provide Advanced Services in the same relevant geographic area (§ 35)
	Begin an Offering Window period to offer promotional discounted prices on monthly recurring charges for unbundled local loops used in the provision of local service to residential end user customers, ordered after the Merger Closing Date (§ 46)
	Begin an Offering Window period to offer promotional resale discounts on telecommunications services that SBC/Ameritech provides at retail to subscribers who are not telecommunications carriers, where such services are resold to residential end user customers (§ 47)

Date	Required Action
30 days following the Merger Closing Date, continued	<p>Begin an Offering Window period to offer promotional, end-to-end combinations of UNEs to provide CLECs with residential POTS service and residential Basic Rate Interface ISDN service (§ 48)</p> <p>Offer to file tariff for enhanced lifeline plan with State commission and copy to FCC (except in Ohio), with conditions comparable to the Ohio Universal Service Assistance plan, to be filed within 60 days of acceptance of the offer (§ 60)</p>
45 days after the Merger Closing Date	Submit preliminary audit requirements to FCC audit staff (§ 62)
2 months after the Merger Closing Date	Submit preliminary audit requirements, including the proposed scope of the audit and the extent of compliance and substantive testing, to the Commission's Audit Staff (§ 6)
60 days following the Merger Closing Date	<p>Notify all small CLECs certificated and operating in SBC/Ameritech States of the availability of OSS expert teams (§ 19)</p> <p>Submit plan for compliance with established conditions (§ 62)</p>
3 months after the Merger Closing Date	Implement and provide 2 months of performance data for Performance Measurements 2, 3, 8-11, 14, 15, 17, 19, 20 in Ameritech States (§ 2)
90 days following the Merger Closing Date	Identify and develop training and procedures beneficial to small CLECs operating in the SBC/Ameritech States (§ 19)
120 days following the Merger Closing Date	Notify all small CLECs certificated and operating in SBC/Ameritech States of training and procedures (§ 19)
5 months after the Merger Closing Date	Implement and provide 2 months of performance data for Performance Measurements 1, 4-7, 12, 13, 16, 18 in Ameritech States (§ 2)
6 months after the Merger Closing Date	Provide access to SBC's Complex Product Service Order System for loop pre-qualification information in SBC States except Nevada and Connecticut (§ 16)
	File cost studies to replace interim rates for xDSL-related services in each State that has not already started or completed cost proceedings for these services (§ 24)
	Provide Advanced Services through separate affiliates in SBC States for the embedded base of customers that are providers of Internet services (compliance date can also be 30 days after State approval of all necessary agreements, whichever is later) (§ 31)
	Provide Advanced Services through separate affiliates in SBC States for the embedded base of customers other than those that are providers of Internet services (compliance date can also be 30 days after State approval of all necessary agreements or 30 days after State approval of all necessary agreements, whichever is later) (§ 31)
	File on a quarterly basis, State-by-State Service Quality reports in accordance with the retail service quality reporting recommendations of the NARUC Technology Policy Subgroup (§ 54)
	Begin trial, if requested, to identify procedures and associated costs required to provide CLECs with access to cabling within MDUs and MTUs, for a period of not greater than 1 year, if requested by a CLEC (§ 57)
9 months after the Merger Closing Date	Pay liquidated damages to CLECs and make voluntary payments to a public interest fund designated by the Commission, in SBC and Ameritech States except Connecticut (§ 2)

10 months after the Merger Closing Date	Submit final collocation audit report to the Commission's Audit Staff (§ 6)
12 months after the Merger Closing Date	Implement and provide 2 months of performance data for all Performance Measurements in Connecticut (§ 2)
	Negotiate with interested CLECs a uniform change management process (assuming agreement with all CLECs) (§ 15)
	Provide electronic pre-order Internet access to the same loop pre-qualification information for xDSL services on a mass market basis as is available to SBC/Ameritech's retail units (§ 22)
	Provide availability of shared transport in Ameritech States under terms and conditions, other than rate structure and price, that are substantially similar to the most favorable terms SBC/Ameritech offers to CLECs in Texas as of July 1, 1999 (§ 42)
	Install local switch for new markets or otherwise obtain switching capability in Miami, Boston, and Seattle (§ 61)
	Provide facilities-based local exchange service to at least one unaffiliated business customer or one non-employee residential customer in Miami, Boston, and Seattle (§ 61)
14 months after the Merger Closing Date	Develop and deploy enhancements to the existing Datagate or EDI interfaces for pre-ordering xDSL and other Advanced Services components, and enhancements to the existing EDI interface for ordering xDSL and other Advanced Services components, in SBC and Ameritech States except Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 16)
15 months after the Merger Closing Date	Pay liquidated damages to CLECs and make voluntary payments to a public interest fund designated by the Commission, in Connecticut (§ 2)
18 months after the Merger Closing Date	Install local switch for new markets or otherwise obtain switching capability in 12 additional markets (§ 61)
	Provide facilities-based local exchange service to at least one unaffiliated business customer or one non-employee residential customer in 12 additional markets (§ 61)
22 months after the Merger Closing Date	Provide electronic pre-order OSS access to the same loop pre-qualification information on an individual address basis as is available to SBC/Ameritech's retail units, in Connecticut, Nevada, and Ameritech States (§ 21)
24 months after the Merger Closing Date	Develop and deploy commercially ready, uniform application-to-application interfaces in SBC and Ameritech States except Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 9)
	Develop and deploy uniform graphical user interfaces in SBC and Ameritech States except Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 10)
	Have collocated facilities (physical, virtual or otherwise) in 10 wire centers in market that can be used to offer facilities-based local services to customers served by those wire centers in Miami, Boston, and Seattle (§ 61)
	Offer facilities-based local exchange services to all business and residential customers served by wire centers in market where collocated in Miami, Boston, and Seattle (§ 61)

	Offer local exchange service by combination of resale, UNEs, and facilities-based service to all business and residential customers that are within (1) local service area of incumbent RBOC within the MSA and (2) incumbent service area of a Tier 1 ILEC serving at least 10% of access lines in the MSA in Miami, Boston, and Seattle (§ 61)
30 months after the Merger Closing Date	Develop and deploy commercially ready, uniform application-to-application interfaces in Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 9)
	Develop and deploy uniform graphical user interfaces in Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 10)
	Develop with CLECs, and deploy either (i) a software solution that shall ensure that CLEC submitted local service requests are consistent with SBC/Ameritech's business rules, or (ii) uniform business rules for completing CLEC local service requests, excluding those differences caused by State regulatory requirements and product definitions (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 14)
	Develop and deploy enhancements to the existing Datagate or EDI interfaces for pre-ordering xDSL and other Advanced Services components, and enhancements to the existing EDI interface for ordering xDSL and other Advanced Services components in Connecticut (§ 16)
	Install local switch for new markets or otherwise obtain switching capability in last 15 markets (compliance date may instead be 60 days after authorization to provide interLATA service to 60% of access lines, whichever is later) (§ 61)
	Provide facilities-based local exchange service to at least one unaffiliated business customer or one non-employee residential customer in last 15 markets (compliance date may instead be 60 days after authorization to provide interLATA service to 60% of access lines, whichever is later) (§ 61)
	Have collocated facilities (physical, virtual or otherwise) in 10 wire centers in market that can be used to offer facilities-based local services to customers served by those wire centers, in 12 additional markets (§ 61)
	Offer facilities-based local exchange services to all business and residential customers served by wire centers in market where collocated, in 12 additional markets (§ 61)

Date	Required Action
30 months after the Merger Closing Date, continued	Offer local exchange service by combination of resale, UNEs, and facilities-based service to all business and residential customers that are within (1) local service area of incumbent RBOC within the MSA and (2) incumbent service area of a Tier 1 ILEC serving at least 10% of access lines in the MSA, in 12 additional markets (§ 61)
42 months after the Merger Closing Date	Have collocated facilities (physical, virtual or otherwise) in 10 wire centers in market that can be used to offer facilities-based local services to customers served by those wire centers, in last 15 markets (compliance date may instead be 1 year + 60 days after authorization to provide interLATA service to 60% of access lines) (§ 61)
	Offer facilities-based local exchange services to all business and residential customers served by wire centers in market where collocated, in last 15 markets (compliance date may instead be 1 year + 60 days after authorization to provide interLATA service to 60% of access lines) (§ 61)
	Offer local exchange service by combination of resale, UNEs, and facilities-based service to all business and residential customers that are within (1) local service area of incumbent RBOC within the MSA and (2) incumbent service area of a Tier 1 ILEC serving at least 10% of access lines in the MSA, in last 15 markets (compliance date may instead be 1 year + 60 days after authorization to provide interLATA service to 60% of access lines) (§ 61)

Timing Dependent on External Factors	
Date	Required Action
Within 12 months of a completed contract	Develop and deploy enhancements to the existing EBI interface for OSS that support maintenance/repair in SBC States except Connecticut (§ 13)
Within 12 months of a completed contract (or in conjunction with the introduction of the EBI interface, whichever is later)	Provide enhancements to the EBI interface in Connecticut and Ameritech States (§ 13)
Prior to providing Advanced Services in a State where SBC/Ameritech does not provide Advanced Services on the Merger Closing Date	Incorporation and establishment of a separate Advanced Services affiliate (§ 30)
30 days after State approval of all necessary agreements with the affiliated incumbent LEC	Provide Advanced Services through separate affiliates in SBC States for new activation of customers. For new activation of customers that are not providers of Internet services, compliance can also be met 30 days after State approval of any certification required by the State (§ 31)